

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

**WAPP TECH LIMITED
PARTNERSHIP and WAPP TECH
CORP.,**

Plaintiffs,

v.

BANK OF AMERICA, N.A.,

Defendant.

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Civil Action No. 4:21-CV-00670-ALM

Jury Trial Requested

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiffs Wapp Tech Limited Partnership and Wapp Tech Corp. (“Wapp Tech”) and Defendant Bank of America, N.A. (“Bank of America”) (collectively the “Parties”) hereby file this Joint Motion to Stay All Deadlines and Notice of Settlement between Wapp Tech and Bank of America.

The Parties recently reached a resolution in principle and are in the process of documenting the settlement. The Parties anticipate submitting final dismissal papers by December 22, 2022. Accordingly, the Parties respectfully request that the Court grant a stay of all proceedings between Wapp Tech and Bank of America, including all pending discovery and all deadlines.

The Parties submit that good cause exists for granting this agreed motion, as set forth above. This motion is not filed for purposes of delay, but so that justice may be served.

Wherefore, the Parties respectfully request that the Court enter the proposed order submitted with this joint motion.

DATED: December 7, 2022

Respectfully submitted,

By: /s/ Alden G. Harris

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Alden G Harris